

KAREN E. BEZNER, ESQ.

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Attorney for Karen E. Bezner, Trustee
Karen E. Bezner
KB 5770

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In the Matter of:	:	In Proceedings for Liquidation
	:	under Chapter 7 of the Bankruptcy
	:	Code
COASTAL CONSTRUCTION GROUP,	:	
LLC,	:	Hon. Michael B. Kaplan, U.S.B.J.
	:	
Debtor.	:	Bankruptcy No. 24-15203
	:	
	:	

NOTICE OF MOTION BY KAREN E. BEZNER, TRUSTEE FOR ORDER
REINSTATING THE AUTOMATIC STAY

TO: Office of the United States Trustee
One Newark Center
Suite 2100
Newark, New Jersey 07102

Maggie McGee, Esq.
Office of the United States Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

Dean Rado
Coastal Construction Group, LLC
235 Hickory Lane
Unit B
Bayville, New Jersey 08721
Debtor

Daniel E. Straffi, Esq.
Straffi & Straffi, LLC
670 Commons Way
Toms River, New Jersey 08755
Counsel for the Debtor

Casey Quinn
Re/Max at Barnegat Bay
221 Lacey Road
Forked River, New Jersey 08731
Listing Broker

Irene Shepard
Caplan Realty Assoc., LLC
2008 Route 37 East
Toms River, New Jersey 08753
Selling Broker for 427 and 429 Boxwood Drive

Gregory J. Hock, Esq.
D'Arcy Johnson Day, P.C.
204 Court House Lane
Toms River, New Jersey 08753
Closing Attorney For Debtor

John Mensching, Esq.
Mensching & Lucarini, P.C.
1200 Hooper Avenue, 2nd Floor
Toms River, New Jersey 08753
Closing Counsel For Purchasers

Wrazen Homes, LLC
3062 Wilbur Avenue
Manchester, New Jersey 08759
Proposed Purchaser

Michael A. Alfieri, Esq.
30 Freneau Avenue
Matawan, New Jersey 07747
Counsel for AVB Investment, LLC

PLEASE TAKE NOTICE THAT the undersigned counsel for Karen E. Bezner, Chapter 7 Trustee shall move before the Honorable Michael B. Kaplan, U.S.B.J. at the United States Bankruptcy Court, United States Courthouse, 402 East State Street, Trenton, New Jersey for an order, reinstating the automatic stay as to two (2) parcels of real property owned by the debtor and located at 427 and 429 Boxwood Drive, Forked River, New Jersey.

PLEASE TAKE FURTHER NOTICE THAT in support of the within application, the undersigned shall rely upon the Certification of Karen E. Bezner, submitted herewith. No brief is necessary for purposes of this motion, as the motion relies for its resolution upon uncontested issues of fact, and raises no contested issues of law. As required by local rule, a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE THAT your response, if any, to the foregoing motion is due to be filed with the Clerk of the Bankruptcy Court and served upon the undersigned counsel for the Trustee no later than seven (7) days prior to the date scheduled for hearing hereon. In the event that no timely objection to the proposed sale is filed and served, the Bankruptcy Court may grant the relief requested by the moving party without need for further hearing.

KAREN E. BEZNER, ESQ.
Counsel for Karen E. Bezner, Trustee

By: /s/ Karen E. Bezner
Karen E. Bezner

Dated: February 7, 2025